

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
NO. 5:09CR27-RLV**

<b>UNITED STATES OF AMERICA</b>	)
	)
<b>v.</b>	)
	)
<b>BERNARD VON NOTHAUS,</b>	)
<b>WILLIAM KEVIN INNES,</b>	)
<b>SARAH JANE BLEDSOE,</b>	)
<b>AND</b>	)
<b>RACHELLE L. MOSELEY</b>	)
<hr/>	)

**THIRD UNOPPOSED JOINT MOTION TO CONTINUE DOCKET CALL**

NOW COME the Defendants, by and through counsel, and move this Honorable Court to continue the above-captioned case from the March 1, 2010 trial term. In support of this motion, the defense shows the following:

1. The defendants are charged in a bill of indictment with violations of Title 18, United States Code Sections 371, 485, 486, 1341 and 2.
2. Defense counsel obtained discovery from the government which contains nearly 2 million documents, hundreds of hours of recorded conversations, and computer hard drives. While exercising due diligence, due to the voluminous amount of discovery materials, defense counsel need additional time to

review discovery so that they are able to provide effective assistance of counsel to their respective clients.

3. Additionally, the discovery materials are in the process being organized into a more easily reviewable format. More time is needed to complete such organization, and even after the materials have been so organized, discovery review will require a considerable amount of time due to the volume of discovery materials.
4. Furthermore, additional time is needed for potential plea negotiations.
5. Opposing counsel has been informed of this motion and does not object to the continuance requested.
6. The ends of justice would be best served if the defendants' cases are continued from the March 1, 2010 trial term.

WHEREFORE, the undersigned counsel requests that this Honorable Court continue the above case from the March 1, 2010 trial term.

This the 16<sup>th</sup> day of February, 2010.

Respectfully submitted,

s/ Matthew G. Pruden  
Matthew G. Pruden  
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Attorney for Mr. Innes

Joe Von Kallist  
Attorney for Ms. Bledsoe

## CERTIFICATE OF SERVICE

I certify that I have served the foregoing **THIRD UNOPPOSED JOINT MOTION TO CONTINUE DOCKET CALL** on opposing counsel by submitting a copy thereof through Electronic Case Filing, to be sent to:

Jill Rose  
Jill.rose@usdoj.gov

This the 16<sup>th</sup> day of February, 2010.

s/ Matthew G. Pruden  
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